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Lead Counsel for the Indirect Purchaser Plaintiffs

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Master File No. 3:07-cv-05944-JST
Case No. 17-cv-04067-JST

MDL No. 1917

This Document Relates to:

All Indirect Purchaser Actions

**DECLARATION OF LAUREN C.
CAPURRO IN SUPPORT PLAINTIFFS'
ADMINISTRATIVE MOTION
PURSUANT TO L.R. 7-11 FOR LEAVE
FOR EXCESS PAGES**

Judge: Hon. Jon S. Tigar

1 I, Lauren C. Capurro, declare as follows:

2 1. I am an attorney duly licensed by the State of California and am admitted to practice
3 before this Court. I am a partner with the law firm Trump, Alioto, Trump & Prescott, LLP and my firm
4 serves as Lead Counsel for the Indirect Purchaser Plaintiffs (“IPPs”) in the above-captioned action. I
5 submit this declaration in support of IPPs’ Administrative Motion Pursuant to L.R. 7-11 For Leave For
6 Excess Pages (“Administrative Motion”). I have personal knowledge of the facts stated herein, and I
7 could and would competently testify thereto if called as a witness.

8 2. IPPs are filing a Reply in Support of Motion Pursuant to Federal Rule of Civil
9 Procedure 62.1 for an Indicative Ruling on Their Motion to Amend the IPP Fee Order and Amend the
10 Plan of Distribution (“Reply”).

11 3. The Reply is related to the above-captioned MDL No. 1917, which has been pending
12 for more than ten years.

13 4. IPPs’ Reply responds to two separate briefs in opposition to IPPs’ Motion Pursuant to
14 Federal Rule of Civil Procedure 62.1 for an Indicative Ruling on Their Motion to Amend the IPP Fee
15 Order and Amend the Plan of Distribution: (1) Objector Dan L. Williams Co.’s Opposition to Indirect-
16 Purchaser Plaintiffs’ Fed. R. Civ. P. 62.1 Motion for an Indicative Ruling (ECF No. 5350), filed by
17 Dan L. Williams & Co.; and (2) the Joint Opposition to IPPs Counsel’s Motion Pursuant to Federal
18 Rule of Civil Procedure 62.1 for an Indicative Ruling (ECF No. 5351), filed by Objectors Anthony
19 Gianasca, Gloria Comeaux, Mina Ashkannejhad individually or as Administrator of the Estate of the
20 Late R. Deryl Edwards, Jr., Rosemary Ciccone and Jeff Craig (the Gianasca Objectors), and Rockhurst
21 University, Gary Talewsky, and Harry Garavanian (the Rockhurst Objectors).

22 5. The Williams opposition brief is 18 pages, and the Gianasca opposition brief is 21
23 pages.

24 6. In my opinion, based on the work I have done on the Reply, and my knowledge of this
25 case having worked on it for over ten years, an additional seven (7) pages are necessary to fully reply
26 to the arguments set forth in each opposition brief.

27 7. Defendants have informed me that they have no objection to this motion.

28 8. Objectors have informed me that they have no objection to this motion.

1 I declare under penalty of perjury that the foregoing is true and correct. Executed on October
2 22, 2018, in San Francisco, California.

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4 /s/ Lauren C. Capurro
Lauren C. Capurro
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